

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	Criminal No. 05-30042-MLW
v.	)	
	)	
CESAR CRUZ,	)	
Defendant	)	

**DEFENDANTS' JOINT MOTION FOR  
ADDITIONAL FUNDS FOR INTERPRETER**

Now come the Defendants and move this Honorable Court to allow additional funds in the amount of \$750.00 for an interpreter, specifically Enrique MacDonald. As grounds therefor, the Defendants submit the attached affidavit.

THE DEFENDANT  
RICARDO DIAZ

THE DEFENDANT  
CESAR CRUZ

/s/ Terry Scott Nagel, Esq.  
By His Attorney  
Terry Scott Nagel, Esq.  
BBO# 366430  
95 State Street, Suite 918  
Springfield, MA 01103  
Tel: (413) 731-8811  
Fax: (413) 731-6641

/s/ Joseph A. Franco, Esq.  
By His Attorney  
Joseph A. Franco, Esq.  
BBO# 543038  
51 Park Avenue, Suite 7  
West Springfield, MA 01089  
Tel: (413) 737-2675  
Fax: (413) 747-1721

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 5, 2006.

/s/ Joseph A. Franco, Esq.

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CESAR CRUZ,	)	
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**AFFIDAVIT IN SUPPORT OF**  
**DEFENDANTS' JOINT MOTION FOR**  
**ADDITIONAL FUNDS FOR INTERPRETER**

Now comes Joseph A. Franco and states that he has personal knowledge of the facts contained herein and makes oath that they are true.

1. I am a duly authorized attorney licensed to practice before this Court.
2. I have been appointed to represent the Defendant, Cesar Cruz, in the instant matter.
3. Additional documentation needs to be reviewed and witnesses must be interviewed.
4. Counsel for the Defendants do not speak Spanish.
5. The assistance of an interpreter is necessary in order to review this discovery which is relevant to both Defendants..
6. The previous funds allowed in the amount of \$500 for each Defendant have been expended.

7. The funds requested are fair and reasonable.
8. The Defendants are indigent and have both qualified for court appointed counsel.
9. But for that indigence of both Defendants an interpreter would be retained privately.
10. Justice dictates that this motion be allowed.

Signed under the pain and penalty of perjury this fifth day of October, 2006.

/s/ Joseph A. Franco, Esq.

Joseph A. Franco, Esq.